

## WQIF Workgroup

1. Conditions for point-to-point trades in § 18.A.1 should also apply to trades executed through the WQIF
2. Compliance credits purchase from WQIF must be backed by projects on the ground and generating nutrient reductions in the same year.
3. Public must have opportunity to review and comment on GP issuance and modification, including approval of individual compliance schedules. GP is subject to EPA approval under 40 CFR 123.62.
4. Definition of “good faith effort” and WQIF fee structure must encourage reduction methods preferred in the bill and not just fall back on purchasing WQIF credits.
5. Are credits generated by un-built facilities allowed to be traded by the permittee or should they be held by WQIF until construction commences?
6. Allocation of limited WQIF credits.
7. How can trading banks be used to encourage Nonpoint source reductions?

## Point Source/Nonpoint Source Trading Workgroup

1. Nutrient credits for activities that would already have taken place under the Tributary Strategy would forestall progress on the Bay clean-up. Trading program must be transparent and accountable to succeed.
2. NPS best management practices must be fully implemented, maintained and proven to provide quantifiable nutrient reductions.
3. BMPs used to create offset credits for additional point source allocations must be as permanent as the point source discharge. This may be accomplished through a permanent easement or condition on the title of the land in question.
4. Counting of nutrient reductions from BMPs required by Tributary Strategies vs. those used as point source offsets. Trading program must result in net reductions.
5. Mandatory monitoring provision for NPS offsets to ensure accountability.
6. How long must offset credits be assured prior to permitting a new discharge?
7. PS-to-NPS trading ratios?
8. Availability of offset credits between now issuance of the GP regulation.
9. How are BMP reduction efficiencies going to be set?

## Schedule of Compliance Workgroup

1. Compliance schedules must require compliance “as soon as possible” and determinations must be made on a facility-by-facility basis.
2. Just what is a compliance plan?

## Permit Structure Workgroup

1. DEQ should provide for public review and comment on any proposal to offset increased discharges, whether via point or nonpoint source reductions, contributions to WQIF or “other means”.
2. Public must have opportunity to review and comment on GP issuance and modification, including approval of individual compliance schedules. GP is subject to EPA approval under 40 CFR 123.62.
3. Clarification on whether new facilities would be able to trade wasteload allocation credits.
4. Nutrient hot spots must be avoided.
5. Minimum technology and offset requirements for facilities permitted prior to 7/1/05 but not yet constructed.
6. Using additional allocations as an incentive to take “non-significant” dischargers and septic tank systems offline.
7. What details should be housed in a document separate from the watershed general permit?